

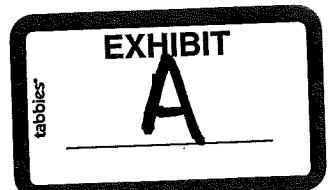
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

LYDIA SATTERFIELD, )  
an individual, )  
                        )  
Plaintiff,         )  
                        )  
vs.                   )      Case No.: CIV-15-354-R  
                        )  
MDOW INSURANCE COMPANY, )  
a foreign insurance company, )  
                        )  
Defendants.         )

**OFFER OF JUDGMENT**

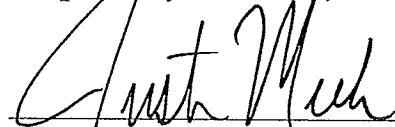
NOW on this 7<sup>th</sup> day of October, 2015, comes the Defendant MDOW Insurance Company (“MDOW”), and pursuant to Federal Rule of Civil Procedure (“FRCP”) 68 and 12 O.S. § 1101.1(B), hereby offers to confess judgment to the Plaintiff, Lydia Satterfield, in the above styled action for the total amount of forty thousand dollars and zero cents (\$40,000.00), which sum is inclusive of costs and attorneys’ fees to the extent these are recoverable by Plaintiff. This offer is made with respect to all claims and damages, legal or equitable, which have been or could have been asserted by Plaintiff in this action.

This offer will be deemed withdrawn if acceptance is not accomplished pursuant to FRCP 68 within fourteen (14) days of receipt of this Offer. This offer is not an admission of liability because liability is denied. Rather, this offer is a compromise offer to settle the case. Further, if this Offer is not accepted as pursuant to the terms of FRCP 68, it shall not be given as evidence at trial or mentioned at trial in the above styled action.



This offer of judgment is made for the purposes specified in FRCP 68, and 12 O.S. § 1101.1(B), and is not to be construed as either an admission that Plaintiff suffered any damage. This Offer of Judgment shall not be filed with the Court unless (a) accepted or (b) in a proceeding to determine fees and costs.

Respectfully submitted,



Ryan Dean, OBA #21152  
Justin D. Meek, OBA #21294  
Kevin H. Cunningham, OBA #22117  
201 Robert S. Kerr  
Suite 1001  
Oklahoma City, Oklahoma 73102  
Phone: 405/262-4040  
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[rdean@basslaw.net](mailto:rdean@basslaw.net)

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that on the 7th day of October 2015, I sent a copy of the document via certified mail and email to:

Clint Brasher, OBA #31798  
BRASHER LAW FIRM  
470 Orleans, Suite 950  
Beaumont, TX 77704  
409/832-3737  
409/832-3838 (Fax)  
[clint@brasherattorney.com](mailto:clint@brasherattorney.com)

Brent D. Berry, OBA #18013  
CARR & CARR  
1350 S.W. 89th Street  
Oklahoma City, OK 73159

**ATTORNEYS FOR PLAINTIFF**

A handwritten signature in black ink, appearing to read "A. Meek", is written over a horizontal line.